

**THE LAW OFFICE OF
NIALL MACGIOLLABHUI**

171 Madison Avenue, Suite 305
New York, New York 10016
T: 646-850-7516
F: 347-620-1395
niallmacg@macglaw.com

August 5, 2022

VIA ECF

Honorable Marcia M. Henry
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Kellner v. City of New York, et al.
Docket No. 17-cv-01268 (MKB) (MMH)**

Dear Judge Henry:

I represent Plaintiff in the above matter. Further to Defendants' letter to the Court dated August 3, 2022, indicating that the NYPD is seeking a court order before it will disclose any information relating to former Detective Litwin's notes to Defendants, I have been advised by opposing counsel that a so-ordered letter stating the following will suffice to enable the release of the notes:

The NYPD has advised that there are privacy concerns of New York Civil Rights Law § 50-b implicated by the notes of former Detective Litwin sought by Plaintiff notwithstanding the redaction of personal identifying information of sex offense victims. Plaintiff is requesting that the Court nevertheless direct the release of the notes.

I thank the Court for its attention to this matter.

Respectfully,

Niall MacGiollabhui
Niall MacGiollabhui

cc: Susan P. Scharfstein, Esq.

SO ORDERED:

Marcia M. Henry

MARCIA M. HENRY
United States Magistrate Judge